



**January 20, 2022**

The Honorable Alejandro Mayorkas  
Secretary  
Department of Homeland Security  
2707 Martin Luther King Jr Ave SE  
Washington, DC 20528

**Re: Vaccination Requirements for Inbound Foreign National Travelers Crossing U.S. Land Ports of Entry**

Dear Secretary Mayorkas:

The Window and Door Manufacturers Association (WDMA) is a national trade association representing the leading producers of residential and commercial doors, windows, and skylights for the domestic and export markets. Our members sell to distributors, dealers, builders, remodelers, homeowners, architects, contractors, and other specifiers in the residential, commercial, and institutional construction markets. WDMA members manufacture high quality products designed and constructed to performance-based standards that provide improved safety, comfort, and energy efficiency in new construction, as well as remodeling and replacement projects.

WDMA writes today to express urgent concern regarding the Department of Homeland Security's (DHS) impending mandate which will require all inbound foreign national travelers crossing any U.S. land or ferry port of entry (POE) to be fully vaccinated for COVID-19 and provide related proof of vaccination by January 22, 2022.<sup>1</sup> This misguided rule by the Administration, threatens to potentially cripple international commerce between the U.S. and its North American trade partners and exacerbate ongoing supply chain challenges plaguing the U.S. economy and the U.S. residential and commercial construction industries in particular.

Prior to this action, the Administration did not require "essential" foreign travelers at the U.S. northern and southern borders to show proof of COVID-19 vaccination before entering the country- including individuals involved with lawful trade, emergency response, and public health.<sup>2</sup> WDMA believed that this original guidance was appropriate and ensured that essential workers could continue to deliver critical goods across the border which so many businesses depend on to keep the economy moving.

To underscore the potential adverse consequences of this mandate, the Canadian Trucking Alliance recently estimated that 12,000-16,000 cross-border commercial truckers could leave the workforce if these new requirements are allowed to go into effect.<sup>3</sup> The loss of these drivers would further complicate the Administration's efforts to alleviate supply chain bottlenecks and bring stability back to the U.S economy.

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<sup>1</sup> <https://www.fmcsa.dot.gov/international-programs/all-inbound-foreign-national-travelers-including-commercial-truck-drivers>

<sup>2</sup> <https://www.dhs.gov/news/2021/10/29/fact-sheet-guidance-travelers-enter-us-land-ports-entry-and-ferry-terminals>

<sup>3</sup> <https://cantruck.ca/north-american-supply-chain-preparing-for-border-and-domestic-vaccination-mandates-cta/>

As the White House's 100-day supply chain report acknowledged last year, imported lumber, steel, aluminum and other building materials are necessary to supplement U.S. domestic supply and meet the needs of American consumers.<sup>4</sup> Any disruption to bilateral trade between the U.S. and its North American neighbors would have detrimental consequences for window, door and skylight manufacturers at a time when the industry is already grappling with record-high labor shortages, supply chain disruptions and inflation.

Further, the DHS's new vaccine requirement for "essential" foreign travelers directly contradicts other health guidance and vaccination mandates issued by the Administration for American workers. As an example, the Administration's recently promulgated ETS on COVID-19 vaccination and testing for large American employers specifically exempts unaccompanied truck drivers from any of the ETS's requirements as they are regularly isolated from other individuals in the workplace.<sup>5</sup> Given that the Administration has already exempted American truck drivers from vaccine requirements due to low exposure risk, it is inconsistent to not also exempt foreign commercial truck drivers whose risk level is no different than their American counterparts.

To conclude, WDMA urges to the Administration to reverse its upcoming vaccination mandate for "essential" foreign travelers into the U.S. and thoughtfully consider the impact this new rule would have on American consumers, manufacturers and other businesses who are struggling in light of increased inflation and supply chain shortages. In addition, WDMA calls on the Administration to engage Canadian government leaders and seek a bilateral agreement to end vaccination mandates for "essential" travelers on both sides of the northern border.

WDMA was encouraged to see the Administration prioritize supply chain resilience through the creation of several Executive Branch working groups and taskforces established when the president took office last year. However, it is time for the Administration to back its rhetoric with action and seek an end to any unnecessary regulations that are hampering the global supply chain and impeding the U.S. economic recovery.

Thank you for your consideration of this important matter. Please contact me at [mobrien@wdma.com](mailto:mobrien@wdma.com) with any questions.

Sincerely,



Michael P. O'Brien, CAE  
President & CEO

cc: Secretary Gina Raimondo  
Secretary Pete Buttigieg

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<sup>4</sup> <https://www.whitehouse.gov/wp-content/uploads/2021/06/100-day-supply-chain-review-report.pdf>

<sup>5</sup> <https://www.osha.gov/coronavirus/ets2/faqs>